

FILED

AUG - 8 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO.
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYCE LANDON SHURTZ,

Defendant.

N

4:19CR00633 CDP/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the anus, genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

- (c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device.
(18 U.S.C. § 2256(6));
- (d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
 - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
 - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about June 1, 2017, and on or about November 7, 2018, within the Eastern District of Missouri and elsewhere,

RAYCE LANDON SHURTZ,

the defendant herein, knowingly received images of child pornography using any means or facility of interstate and foreign commerce, that is, the defendant received graphic image files via the Internet which contained child pornography, including, but not limited to, the following:

- a. “Nablot Sucker.mp4,” a graphic video file that depicts, in part, a prepubescent minor male performing oral sex on a male;
- b. “JB159.mp4,” a graphic video file that depicts, in part, a prepubescent minor female in a lascivious display of her genitals; and
- c. “Nablot 2.mp4,” a graphic video file that depicts, in part, someone inserting their finger into the rectum of a prepubescent minor female and prepubescent minor children engaged in sexual activity;

In violation of Title 18, United States Code, Sections 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

- 1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
- 2. Between on or about October 1, 2018, and on or about November 7, 2018, within the Eastern District of Missouri and elsewhere,

RAYCE LANDON SHURTZ,

the defendant herein, did knowingly possess material that contained images and videos of child pornography that were produced using material that traveled in interstate and foreign commerce, to wit, a Western Digital external hard drive that was produced in Malaysia and, therefore, traveled in interstate and foreign commerce, and said hard drive contained child pornography, including, but not limited to, the following:

- a. “PEDO – preteen 10yo fucki.mpg,” a graphic video file that depicts, in part, a male engaged in sexual intercourse with a prepubescent minor female;

- b. “videofree.wmv,” a graphic video file that depicts, in part, a prepubescent minor female in a lascivious display of her genitals; and
- c. “Child_7Yo_1.avi,” a graphic video file that depicts, in a part, a male engaged in sexual intercourse with a prepubescent minor female;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

ROBERT F. LIVERGOOD, #35432MO
Assistant United States Attorney